

To: Mr. John A. Karousos
Chief, Allocations Branch
Policy And Rules Division
Mass Media Bureau
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

From: Jarel Pittman
JPI Radio Inc.
12104 Old Hwy 169
Hibbing Mn 55746

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JUL 22 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

DOCKET FILE COPY ORIGINAL

RE: Cover Letter for proposed rule making

Dear Mr. Karousos,

Please find enclosed one original and 4 copies of a petition to institute a rule making to the FM
table of allotments for Strassburg Co.

Thank You Very Much.

Jarel L. Pittman
JPI Radio Corporate Officer

JP:nb

No. of Copies rec'd 07 4
List ABCDE

J. P. I. Radio Inc.
12104 Old Highway 169
Hibbing, MN 55746
(218)263-3000

July 7, 1996

Mr John A. Karousos
Chief, Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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Dear Mr. Karousos,

This is a petition to institute a rule making to amend the FM Table of Allotments in section 73.202(b) of the Commission's Rules. The specific request is to add channel 249 (99.7 MHz) as a Class C3 allotment assigned to the city of Strasburg, CO

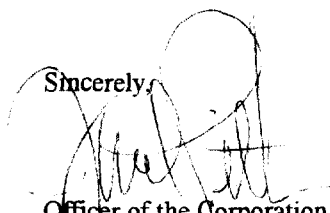
This new allotment is needed because, at present, there are no operating FM stations within 50 kilometers of Strasburg. There is one Construction Permit assigned to call sign KAGM, and dating back to 1989, but it is unbuilt.

This petition would further request that the new allotment be set aside for NonCommercial Educational use only, as the nearest NCE station is 90 km away (KGNU in Bolder, CO). The establishment of new NCE stations near Strasburg is inhibited by the presence of 100,000 watt TV Channel 6 station KRMA in Denver, CO. This is why a channel above 220 was chosen for this petition.

J. P. I. Radio has already filed an application for the new channel, file number BPED960580MA, indicating a desire to apply for the newly allotted channel.

The appended listing shows clearly that there exist locations near Strasburg which can satisfy the minimum distance separation requirements of the Rules, Section 73.207. The one spacing violation shown is the premature application for the allotment made by the petitioner.

Sincerely,


Officer of the Corporation

encl.
Spacing Data
Signed & 4 Copies

07-07-1996

BOB MOORE - BROADCAST CONSULTANT

(219) 534-2002

CH# 249C3 96.7 MHz

Exhibit

INTERFERENCE CHECKS WITH PROP, STRASBURG, CO at N LAT. 39 45 32 W. LNG. 104 09 05

PWR = 25 kW H.A.A.T. = 100 M

Protected F(50-50) 60 dBu = 39.08 km

F(50-10) 40 dBu = 113.63 54 dBu = 60.1 80 dBu = 12.86 100 dBu = 4.06
 F(50-10) 37 dBu = 130.53 51 dBu = 69.75 77 dBu = 15.58 97 dBu = 4.89
 F(50-10) 34 dBu = 146.27 48 dBu = 80.10 74 dBu = 19.19 94 dBu = 5.84

CH#	CALL	TYPE	* IN *	* OUT *	BEARING	DISTANCE	LAT.	PWR (kW)	INT (km)	PRO (km)
CITY	STATE	LICENSEE					LNG.	HAAT (M)	COR (M)	FILE #
247C	KBCOFM	LI DEY	96.0 R	3.2 M	280.4	99.15 km	39 54 48	100.00	43.63	84.84
Boulder	CO	Centennial Wireless, Inc.			180.4	61.61 Mi	105 17 32	470.0	2583	BLH850626KN
249A	KSPNFM	LI CN	142.0 R	96.2 M	256.4	233.18 km	39 13 33	3.00	53.28	13.22
Aspen	CO	Moss Entertainment Corpora			26.4	143.90 Mi	106 50 00	-26.0	2876	BLH6841
FCC Comment > *To Amend to Channel 249C3 per D89-198										
249C3	AP249	AP CN	153.0 R	-153.0 M	0.0	0.00 km	39 45 32	20.00	110.86	39.42
Strasburg	CO	J.P.I. Radio Incorporated			180.0	0.00 Mi	104 09 05	114.0	1675	BPED960508MA
FCC Comment > No Allotment for this Channel in this City and State										
249C3	ALOPEN	AL N	153.0 R	85.2 M	256.4	233.18 km	39 13 33	25.00	113.63	39.08
Aspen	CO	89-198			26.4	143.90 Mi	106 50 00	100.0	0	
FCC Comment > Effective 5-18-90 Rsvd for KSPNFM per D89-198										
250C1	KIGN	LI CN	144.0 R	21.7 M	334.4	165.68 km	41 06 01	100.00	90.13	60.32
Cheyenne	WY	Magic City Media, Inc.			354.4	102.95 Mi	105 00 23	165.0	2174	BLH800229AD
250C1	AP250	AP CN	144.0 R	82.5 M	99.7	326.47 km	39 23 19	100.00	93.96	63.32
Colby	KS	Melia Communications, Inc.			279.7	140.12 Mi	101 33 34	195.0	1275	BPH960517MB
251C	KKFM	LI CN	96.0 R	32.4 M	208.7	123.36 km	38 44 36	71.00	49.93	91.95
Colorado Springs	CO	Citadel Communications Cor			28.7	10.76 Mi	104 51 44	698.0	2949	BLH940321KC
252C2	KATRFM	LI CN	56.0 R	94.5 M	70.0	151.49 km	40 12 36	50.00	4.48	41.96
Wray	CO	New Directions Media Inc.			250.0	93.51 Mi	102 29 24	85.0	1283	BLH940222KE

HOW TO READ THE FM COMPUTER PRINT-OUT

The computer print-out should be self-explanatory for the most part. The parameters of the station being checked, (reference station) are printed in the heading. The 60 dBu protected contour is predicted from the Commission's F(50-50) table, while the 40, 54, 80 and 100 dBu contours are interference contours derived from the Commission's F(50-10) table. Contour distances are in kilometers and are predicted using spline interpolation from data points identical to those published in Report No. RS 76-01 by Gary C. Kalagian. Critical contour distances are determined using the Commission's TVFMINT FORTRAN subroutine. When interference contour distances are less than 16 kilometers the F(50-50) tables are used. If signal contour distances are less than 1.6 km the free-space equation is used.

The column listed "*** IN ***" is the sum of the reference station's 60 dBu protected contour and the data file station's interference contour subtracted from the distance between the stations. (All distances are derived by the method detailed in Sec. 73.208 of the Rules and Regulations as amended in Docket 80-90.) Therefore, the column is a measure of incoming interference. Negative distances in this column indicate the presence of interference. Listed antenna heights are the average heights of eight standard radials as found in the Commission's records unless otherwise noted, in which case the specific antenna heights along the azimuths between the reference station and the database station are used and visa versa. The column labeled "*** OUT ***" shows the distance of kilometers of overlap or clearance between the reference station's interference contour and the database station's protected contour. Negative distance figures in this column indicate outgoing interference.

Under the "**BEARING**" column, the first row of numbers indicate the bearings from true north of the data base stations in relationship with the reference station, while the numbers in the second row indicate the reverse bearings from the database station to the reference station.

The columns labeled "**INT**" and "**PRO**" hold the distance in kilometers of the appropriate interference contour and the protected contour of a data base station

For I.F. relationships the "**IN**" and "**OUT**" columns change their significance. The letter "**R**" stands for the minimum required distance in kilometers, while the letter "**M**" in the next column follows the available clear space separation in kilometers or "**Margin**". This same procedure is used for all Canadian and Mexican spacing. Minimum separation distances were taken from Sec 73.207 of the rules as amended. Canadian separation distances were derived from the "**Canadian/American Working Agreement**". The first three letters of the "**TYPE**" column identify the current F.C.C. status of the stations. The fourth letter will be a "**D**" or "**Z**" (Sec. 73.215) if the facility is directional. The fifth letter will be an E, H or V depending on the type of antenna polarization. The sixth letter will be a "**Y**" if the antenna uses beam tilt